

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

My name is Dave Jaconette, and I am the Program Director for WQLR-AM, a sports station here in Kalamazoo, Michigan. I am also the host of an afternoon drive talk show on WKZO AM 590. I have worked at WKZO for 21 years, and for four different ownership groups (Fetzer Broadcasting Company, Radio Associates, Fairfield Broadcasting Company, and now Midwest Communications). I have been a board operator, producer, news writer and reporter, announcer/disc jockey, movie reviewer, traffic director, talk show host, and program director.

I can tell you that from my perspective, radio has never been more responsive to our listeners needs. We have to be. Here in Kalamazoo, our stations at the Midwest Radio Group are practically public utilities. We respond to the needs of our listeners because we are connected to our community. We pay attention to comments and suggestions about programming, we provide unique service to our advertising clients, and we assist non-profit organizations in many ways.

We don't just serve the community, we are a part of it. We live here, we work here, and we, not the government, are more qualified to know and understand the needs of our community, and serve it. The notion that the government can presume to know how to connect and serve our community better than those of us living here is far-fetched. There is ample oversight through regulations already in place, to make sure that we are decent stewards of the airwaves. Our standards are much higher, of course. But to have a re-regulated environment would have a chilling effect on our service to our listeners and our community.

Potential new regulations that would require us to have our main studios in our community of license, prohibit unattended operation of broadcast facilities, establish minimum programming requirements, establish community advisory boards, establish national playlists, etc., would in most cases have a chilling effect. We would lose operating efficiency, have to move to a more remote location than the easily accessible location we are now in; our programming would have a "cookie-cutter" feel, instead of tailoring it to local tastes; we currently have access to the best "advisory board" we could ask for: our entire community. Our local audience, our local programmers, our local Chamber of Commerce, our local non-profits, our local activists, our local politicians and public servants all provide valuable input. We ask for that input and feedback. We solicit it, and it is freely given. How can a centralized entity do a better job of seeing that we serve our community, than we can ourselves.

Quite simply, it is in our own best interests to see to it that we are as responsive and connected to our community as we possible can be. To add needless, though well-intended, regulation to the mix would be counterproductive. Radio works, and works best when broadcasters are able to serve their communities without burden of centralized regulation. Let the market place work. It does, and it will.

Respectfully submitted,

Dave Jaconette

Dave Jaconette

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